

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

This Document Relates To:

*Breathitt County Board of Education v. Meta
Platforms Inc., et al*

MDL No. 3047

Case No. 4:23-cv-01804-YGR

**DECLARATION OF ASHLEY M.
SIMONSEN IN SUPPORT OF
DEFENDANTS' REPLY IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT
(BREATHITT) (SD MSJ No. 1)**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Date: January 26, 2026
Time: 8:00 am

Place: Courtroom 1, 4th Floor

DECLARATION OF ASHLEY M. SIMONSEN

I, Ashley M. Simonsen, declare as follows:

1. I am a partner with the law firm Covington & Burling LLP, counsel of record for Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Meta Payments Inc. f/k/a Facebook Payments Inc.; Meta Platforms Technologies, LLC f/k/a Facebook Technologies, LLC; Instagram, LLC; and Siculus LLC f/k/a Siculus, Inc. I have personal knowledge of the following facts and events, and, if called as a witness, I could and would testify competently thereto.

2. I submit this Declaration in support of Defendants' Reply in Support of Defendants' Motion for Summary Judgment (BREATHITT) (SD MSJ No. 1), filed concurrently with this Declaration.

3. Attached as **Reply Exhibit 1** is a true and correct copy of excerpts of the Kera Howard 30(b)(6) Deposition transcript, dated March 10, 2025.

4. Attached as **Reply Exhibit 2** is a true and correct copy of excerpts of the Phillip Watts Deposition transcript, dated July 28, 2025.

5. Attached as **Reply Exhibit 3** is a true and correct copy of excerpts of the Phillip Watts 30(b)(6) deposition transcript, dated April 22, 2025.

6. Attached as **Reply Exhibit 4** is a true and correct copy of excerpts of the Daphne Noble Deposition transcript, dated July 29, 2025.

7. Attached as **Reply Exhibit 5** is a true and correct copy of excerpts of the Jeremy Hall Deposition transcript, dated July 28, 2025.

8. Attached as **Reply Exhibit 6** is a true and correct copy of excerpts of the Kera Howard Deposition transcript, dated March 10, 2025.

9. Attached as **Reply Exhibit 7** is a true and correct copy of excerpts of the Kera Howard Declaration, dated November 7, 2025.

10. Attached as **Reply Exhibit 8** is a true and correct copy of excerpts of the Jeremy Hall Deposition transcript, dated April 23, 2025.

11. Attached as **Reply Exhibit 9** is a true and correct copy of excerpts of the Jeremy Hall 30(b)(6) Deposition transcript, dated April 23, 2025.

1 12. Attached as **Reply Exhibit 10** is a true and correct copy of excerpts of the Daphne Noble
2 30(b)(6) Deposition transcript, dated March 11, 2025.

3 13. Attached as **Reply Exhibit 11** is a true and correct copy of excerpts of the William Noble
4 Deposition transcript, dated July 28, 2025.

5 14. Attached as **Reply Exhibit 12** is a true and correct copy of excerpts of the Stacy McKnight
6 30(b)(6) Deposition transcript, dated April 21, 2025.

7
8 I declare under penalty of perjury under the laws of the United States of America that the foregoing
9 is true and correct.

10
11 Dated: December 5, 2025

By: Ashley M. Simonsen
Ashley M. Simonsen